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October 13, 2021

**VIA ECF**

Hon. Andrew L. Carter, Jr.  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: Lopez Catzin et al. v. Thank You & Good Luck Corp et al.  
Case No.: 15-cv-7109 (ALC)

Dear Judge Carter:

We represent Plaintiffs in this matter. We write to respectfully request an extension of two weeks of the deadlines to move to enter a judgment and for attorneys' fees and costs. This is the second request, and Defendants consent to this request. The current deadlines are:

- (1) Plaintiffs' motion to be filed by October 15, 2021;
- (2) Defendants' opposition to filed by November 17, 2021; and
- (3) Plaintiffs' reply to be filed by December 1, 2021.

The proposed revised schedule is as follows:

- (1) Plaintiffs' motion to be filed by October 29, 2021;
- (2) Defendants' opposition to filed by December 3, 2021; and
- (3) Plaintiffs' reply to be filed by December 17, 2021.

The reason for this request is that I am still catching up after an extremely busy last previous month resulting from the Jewish holidays and my father's hospitalization. Further, my firm has an October 18, 2021 deadline to file an appellate brief in 1199SEIU United Healthcare Workers E. v. PSC Cnty. Servs., Court of Appeals Docket No. 21-633, a consolidated appeal involving dozens of parties, some of whom we must coordinate our brief with. As a result, we respectfully request that extension requested above.

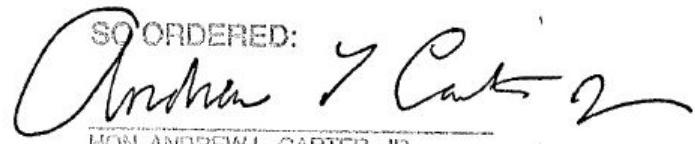
Thank you for your attention to the above.

Respectfully Submitted,

-----/s/-----

Michael Taubenfeld

The request for an extension of the briefing  
schedule is hereby **GRANTED**.

SO ORDERED:  
  
\_\_\_\_\_  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

Dated: 10/14/2021